**Rebuttal to Comment of Bruce Perens of 2019-April-28**

I am a licensed extra class amateur radio operator with the call sign K3WA. I have been active since 1956. And I fully support RM-11831. As a result, I am compelled to rebut Mr. Perens comments of 28 April 2019.

Specifically:

In paragraph 2.2 Mr. Perens discussed bandwidth issues. He is correct in stating that digital transmissions and SSB radiotelephone would use approximately the same bandwidth, with neither mode displacing multiple operations of the other. However, if RM-11831 is not adapted, what would prevent these wide band signals from displacing numerous narrow bandwidth transmissions in those parts of the amateur radio spectrum now allocated to Continuous Wave (CW) and other digital emissions?

In paragraph 2.4 Mr. Perens make the case that “The National Security Issue Proposed Is Fanciful and Unsubstantiated”. I would ask “how so?” That is only his opinion. Any transmission that is not open to be read (copied, heard, or otherwise open) to the entire radio amateur community cannot be verified. That alone would open the ability for use by all sorts of users who may not even be licensed amateur radio operators and easily could be drug runners, smugglers, or terrorists. And, since the transmission is not “readable” we would **never know**.

And lastly, since the earliest days of amateur radio, licensed amateurs have taken care to not transmit on a frequency currently is use. Acting otherwise constitutes Deliberate QRM (DQRM - deliberate interference) a bane to operations. The FCC actively punishes DQRM with fines and loss of license privileges. Encrypted signals would make DQRM enforcement next to impossible. Moreover, with non-attended, semi-autonomous one wonders if these transmissions would pop up here or there with no regard to on-going transmissions on that frequency.